

FILED
JAMES BONINI
CLERK

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WEST DIV CINCINNATI

UNITED STATES OF AMERICA,

Plaintiff

v.

Homer Lee Richardson and Robert C. Welti,

Defendants

Case No. 1:08-cr-00118-SSB

Notice of Correction

DEFENDANT WELTI'S NOTICE OF CORRECTION

Defendant Robert C. Welti, ("Welti"), with Attorney Kevin Michael Schad, as standby counsel, respectfully files a Notice of Correction, in regard to his Rule 16 Second Request for Discovery, replacing the documents originally filed.

Defendant Welti originally filed a copy of the wrong letter.

See the attached Second Request for Discovery and Letter to the Olivers.

Respectfully submitted

7/23/09
Date

Robert C. Welti
Signature

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON July 23, 2009, I sent a copy of

Defendant's Notice of Correction by first class mail to:

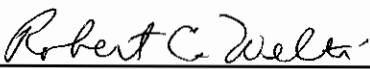
Gregory G. Lockhart
United States Attorney
Federal Building
200 W. Second Street, Suite 602
Dayton, Ohio 45402

Kevin Michael Schad
Schad & Schad
1001 W. Main Street, Suite F
Lebanon, Ohio 45036-7955

Thomas G. Voracek
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601 D Street, N.W.
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601 D Street, N.W.
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Charles E. McFarland
338 Jackson Road
New Castle, KY 40050



Server

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

Homer Lee Richardson and Robert C. Welte,

Defendants

Case No. 1:08-cr-00118-SSB

Second Request for Discovery

DEFENDANT WELT'S SECOND REQUEST FOR DISCOVERY

Defendant Robert C. Welte, ("Welte"), with Attorney Kevin Michael Schad, as standby counsel, respectfully renews his Rule 16 Request for Discovery, seeking documents related to the various entities used by Charles D. and Leanna C. Oliver.

See the attached copy of a letter sent to the Olivers, May 11, 2009.

The documents in the possession of Defendant Welte, and even those in the Office of the U.S. Attorney, in regard to Charles D. and Nancy L. Hansen, and Kenneth E. Smith, III, appear to be complete, but those in regard to the Olivers are missing certain documentation, the entities used in the preparation of their returns.

Specifically, Defendant Welti is seeking information regarding the Business, Equity, Leasing and Transportation (Vehicle) Trusts used by the Olivers, and all notes and correspondence used by Welti in the preparation of their returns.

These include, but are not limited to:

1. American Equity Mortgage, Inc.
2. "Another" corporation (name unknown at this time)
3. Title Resources Title Agency, Inc.
4. An IBC (name unknown)
5. American Equity Mortgage, LLC
6. Title Resources Title Agency, LLC
7. Equity Limited Partnership
8. Strategic Financial Asset Management Trust
9. Strategic Financial Business Trust
10. Strategic Financial Equity Trust
11. Strategic Financial Leasing Trust
12. Strategic Financial Transportation Trust
13. Oliver Charitable Trust
14. Chico International Trust

Defendant Welti also seeks a complete copy of the examination report issued by IRS Revenue Agent, Jeanette Maggiacomo, in regard to the audits conducted on the above-name entities, including any and all notes and correspondence between Ms. Maggiacomo and the Olivers, any and all notes and correspondence between Ms. Maggiacomo and Defendant Welti, and any and all notes and correspondence between Ms. Maggiacomo and her superiors, relevant to the above-named entities.

CONCLUSION

WHEREFORE, Defendant Welti respectfully asks this United States District Court for help in the discovery of items mentioned above, as they represent material facts necessary for Defendant Welti's preparation of a "good faith" defense.

Respectfully submitted

7/23/09
Date

Robert C. Welti
Signature

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON July 23, 2009, I sent a copy of

Defendant's Second Request for Discovery by first class mail to:

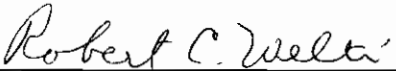
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Server

ROBERT C. WELTI
135 North Third Street
Ripley, Ohio 45167-1114
Phone: 937-392-4426
Email: bopat88@sbcglobal.net

May 11, 2009

Mr. Charles D. Oliver
7303 Dayton Springfield Road
Enon, Ohio 45323-1462

Dear Mr. Oliver:

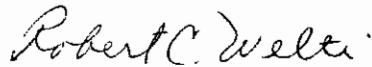
Several years ago as a result of the Internal Revenue Service requesting an examination of your and your various business entities you requested that I provide you with all the records pertaining those various entities that I had in my possession.

I complied with that request by leaving two or three boxes containing those records at your residence which was at that time on Peshek Lane.

It is now imperative that I locate some of the records in those boxes to help me in my present case with the United States Department of Justice.

Please contact me, either by phone or email, to let me know where I may be able to search those records to locate the items I am looking for.

Very truly yours,

A handwritten signature in cursive script that reads "Robert C. Welti".

Robert C. Welti